

IN THE UNITED STATES DISTRICT COURT  
FOR THE Western District of PENNSYLVANIA

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

APR - 9 2008

FILED

DONALD L. Mostler, Jr.  
Plaintiff

VS.

Civil Action NO. 05-180-(ERIE)

FEDERAL BUREAU OF PRISONS et al,  
WARDEN, James SHERMAN;  
DR. H. Beam; DR. OLSON; DR. SMITH  
Defendants

Motion for Appointment of  
Counsel

PURSUANT TO 28 USC §1915 (e)(1) Plaintiff moves for

AN ORDER Appointing Counsel TO represent him in this case, in  
support of this motion, Plaintiff states;

1. Plaintiff is unable TO afford counsel, he has requested  
leave TO proceed in FORMA PAUPERIS.

2. Plaintiff's imprisonment will greatly limit his ability  
TO litigate, the issues involved in this case ARE complex, AND  
will require significant research AND investigation.

Plaintiff has limited knowledge of the law, WHICH THE  
GOVERNMENT HAS SO FAR TAKEN ADVANTAGE OF KNOWING

Full well plaintiff's hands are tied AND plaintiff don't know NOTHING about the LAW, OR HOW TO FILE the proper motions, KNOWS plaintiff CAN'T Retrieve very vital evidence, OR FIND a expert witness, SUCH AS the U.S Government HAS AND Relys ON mostly for there white CASE, instead of all the Facts presented By plaintiff.

3. A trial in this case will adduce conflicting testimony, plaintiff must have counsel to present evidence AND crossexamine witnesses, TO Biring out all the True Facts, plaintiff had his amendment dismissed Because He didn't inform the courts why He didn't file His Administrative remedy, which was because plaintiff was locked into SHU, AND could not get the proper forms. AND I WAS TRANSFERRED Right After my SURGARY # 2

UNDERSTAND ITS TOO LATE NOW,

4. plaintiff did make repeated efforts to obtain counsel. At this time plaintiff can't have any names or returned letters, so to the fact most all of his papers were lost between two transfers.

5. Wherefore, plaintiff request that the court appoint Attorney Gloria Gillman, 924 Cherry St, 5th Floor, Philadelphia, PA 19107, MRS. Gillman is an honorable member of the PENNSYLVANIA BAR, AS COUNSEL IN THIS CASE.

Respectfully Submitted By:  
Donald L Moshier Jr  
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